

1 I. NEEL CHATTERJEE (STATE BAR NO. 173985)  
nchatterjee@orrick.com  
2 MONTE M.F. COOPER (STATE BAR NO. 196746)  
mcooper@orrick.com  
3 THERESA A. SUTTON (STATE BAR NO. 211857)  
tsutton@orrick.com  
4 MORVARID METANAT (STATE BAR NO. 268228)  
mmetanat@orrick.com  
5 ORRICK, HERRINGTON & SUTCLIFFE LLP  
1000 Marsh Road  
6 Menlo Park, California 94025  
Telephone: 650-614-7400  
7 Facsimile: 650-614-7401

8 Attorneys for Plaintiff  
FACEBOOK, INC.  
9

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION  
13

14 FACEBOOK, INC.,

15 Plaintiff,

16 v.

17 POWER VENTURES, INC., a Cayman Island  
corporation; STEVE VACHANI, an individual;  
18 DOE 1, d/b/a POWER.COM, DOES 2-25,  
inclusive,

19 Defendants.  
20

Case No. 5:08-cv-05780 JW

**STIPULATION AND [PROPOSED]  
ORDER, PURSUANT TO CIVIL  
LOCAL RULE 6-2, FOR ORDER  
CHANGING TIME**

1 This stipulation and the accompanying Declaration of counsel is entered into by and  
 2 between Plaintiff Facebook, Inc., on the one hand, and Defendants Power Ventures, Inc. and  
 3 Steve Vachani ("Defendants"), on the other hand, through their respective counsel as follows:

4 WHEREAS, on February 16, 2012, the Court entered summary judgment of liability on  
 5 behalf of Facebook and against Defendants on Facebook's claims for violations of the CAN-  
 6 SPAM Act, the Computer Fraud and Abuse Act, and California Penal Code Section 502 (Dkt. No.  
 7 275);

8 WHEREAS as part of the summary judgment Order, this Court further ordered the parties  
 9 to file simultaneously supplemental briefs by March 2, 2012 addressing the individual liability of  
 10 Defendant Vachani and the amount of damages to be awarded to Facebook (Dkt. No. 275, at 19);

11 WHEREAS, on February 24, 2012, the Court ordered Power Ventures to attend a further  
 12 deposition pursuant to Fed.R.Civ.P. 30(b)(6) on Wednesday, February 29, 2012 (Dkt. No. 279);

13 WHEREAS, the parties agree that to ensure that the briefing and deposition schedules  
 14 adequately address the issues remaining in this case, the deadlines for supplemental briefing and  
 15 the taking of the Rule 30(b)(6) deposition should each be extended by one week;

16 NOW THEREFORE, subject to the approval of the Court, it is hereby stipulated and  
 17 agreed that Facebook's and Defendants' deadline to file their supplemental briefs in response to  
 18 this Court's February 16, 2012 Order Granting Facebook's Motions for Summary Judgment is  
 19 extended until Friday, March 9, 2012; and Power Ventures Rule 30(b)(6) deposition shall be  
 20 completed by Wednesday, March 7, 2012.

21  
 22 Dated: February 29, 2012

ORRICK, HERRINGTON & SUTCLIFFE LLP

23  
 24 By: /s/ Monte M.F. Cooper /s/

MONTE M.F. COOPER

Attorneys for Plaintiff

FACEBOOK, INC.

25  
 26  
 27 ///

1 Dated: February 29, 2012

BURSOR & FISHER, P.A.

2  
3 By: /s/ L. Timothy Fisher /s/

4 L. TIMOTHY FISHER  
5 Attorneys for Defendants  
6 POWER VENTURES, INC.; STEVE  
7 VACHANI; and POWER.COM

8 **Filer's Attestation:** Pursuant to General Order No. 45, §X(B), I attest under penalty of  
9 perjury that concurrence in the filing of the document has been obtained from its signatory.

10 Dated: February 29, 2012

Respectfully submitted,

11 /s/ Monte Cooper

12 MONTE F. COOPER

13  
14 PURSUANT TO STIPULATION, IT IS SO ORDERED:

15  
16 DATED: \_\_\_\_\_

17 JAMES WARE  
18 United States District Judge